

recommended that the U.S. seek resolutions and footnotes that "identify" particular spectrum as being well suited for public safety use and commend to Administrations its use for those purposes.

Motorola fully supports TIA's efforts. Bands below 1 GHz have the advantage of good propagation characteristics for terrestrial mobile use and are close to existing allocations, potentially reducing the costs of manufacture and use of receivers and transmitters. The spectrum shortages already present will grow particularly acute by the beginning of the next century, making this a timely topic for WRC-97.

Motorola supports allocation of suitable spectrum for all private users, including Public Safety. ²⁵ The 380-399.9 MHz frequency band is particularly appropriate for public safety use. In many countries, this band is allocated for governmental use; throughout Europe and North America, the band is used by NATO for tactical communications. NATO recently has agreed to share the 380-385 MHz and 390-395 MHz bands with terrestrial public safety communications.²⁶ And, as the FCC acknowledges,²⁷ several European nations have also proposed to license all or portions of this band for terrestrial land mobile systems for public safety communications.

Rarely does an existing user of scarce spectrum agree to share its band with others; rarely – at least recently – are the allocation policies of the U.S and the European Union fully consistent. Taken together, these trends represent a uniquely painless opportunity to assure additional spectrum for a valuable and needy service.

²⁶ See NATO Unclassified Memo from Colonel M. Tange, ARFA-C(94)-1982L-SPA/530/1 (Nov. 30, 1994) (attached hereto as Attachment 2). The NATO plan provides for a transition into the 380-385 and 390-395 MHz portion of the band.

²⁷ See Second NOI, ¶ 57 n.88.

Motorola is aware that some Little LEO applicants would also like to secure this band for MSS. Motorola submits, however, that this represents a particularly poor choice, for two reasons. First, NATO has already agreed to share much of the band with terrestrial land mobile public safety services, not with mobile satellite systems. Second, it is far from clear that MSS systems could share with the existing governmental use.

In sum, Motorola recommends that the U.S. oppose attempts by Little LEO proponents to access congested terrestrial land mobile bands. Further, the U.S. should ensure that WRC-97 is competent to address identifying additional terrestrial land mobile spectrum below 1 GHz for public safety applications. In particular, Motorola supports TIA's proposal to examine spectrum near 400 MHz where the U.S., NATO and the Europeans may all have an identical interest in ensuring the best possible communications systems for protecting life and property.

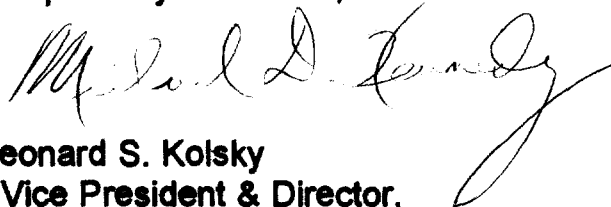
C. Motorola Supports Efforts to Allocate Spectrum for High Speed Wireless Data Systems

Motorola supports the recommendations of AT&T that the agenda for WRC-97 include consideration of an allocation for high speed wireless data (HSWD) systems in the 5.2 GHz band.²⁸ Motorola's commitment and belief in the necessity and utility of wireless data devices is a matter of record before the FCC as part of its efforts to identify spectrum for asynchronous and isosynchronous unlicensed PCS data systems in the 2 GHz band. Notwithstanding that allocation, Motorola agrees with AT&T that greater bandwidths are necessary to obtain faster data transfer rates. Although current industry efforts are focusing on products for the 2 GHz PCS band and the 2.5

²⁸ See Second NOI at ¶ 95.

GHz ISM band, spectrum in the 5.2 GHz band would provide a logical home for a future generation of high speed data devices and would offer the advantage of a consistent allocation plan with Europe. For these reasons, Motorola supports U.S. efforts to obtain a future WRC agenda item seeking this allocation.

Respectfully submitted,



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Dated: March 6, 1995

ATTACHMENT 1

Proposals for Ka Band Non-GSO MSS Feeder links

Consistent with the report of ITU-R TG-4/5 which has been endorsed by IWG-4, the following proposals are recommended for Ka band Non-GSO feeder links.

A. In the allocation 18.8-19.7 GHz add the following footnote:

ADD 872A

The frequencies in the band 19.2-19.7 GHz are primarily for use by Non-GSO MSS feeder links in the space-to-Earth direction. RR 2613 does not apply. Coordination of these frequencies will be carried out in accordance with the provisions of Resolution 46. Future GSO/FSS networks will not cause harmful interference to, or receive protection from Non-GSO MSS feeder link networks in this band.

Reason:

The language in this footnote was agreed to by ITU-R Task Group 4/5 as the basis for ensuring the availability of the frequencies in this band for Non-GSO MSS feeder links.

B. In the allocation 28.5-29.5 GHz add the following footnote:

ADD 882H

The frequencies in the band 29.0-29.5 GHz are primarily for use by Non-GSO MSS feeder links in the Earth-to-space direction. RR 2613 does not apply. Coordination of these frequencies will be carried out in accordance with the provisions of Resolution 46. Future GSO/FSS networks will not cause harmful interference to, or receive protection from Non-GSO MSS feeder link networks in this band.

Reason:

Same as 872A above.

Proposal for Article 27 Site Selection/Power Limit in bands shared with Non-GSO MSS feeder links and related services

Consistent with sharing studies currently in process in ITU-R WP-4/95, the following proposals are recommended for terrestrial radiocommunication services sharing frequency bands with Non-GSO MSS feeder links and related space radiocommunication services in specific frequency bands.

ADD 2504B

As far as practicable, sites for transmitting stations, in the fixed or mobile service radiating at elevation angles of 2° or greater shall restrict their equivalent isotropic radiated power (e.i.r.p.) density to no more 24 dBW/MHz in clear air in the frequency bands 22.55-23.55 and 29.0-29.5 GHz. Operation at higher e.i.r.p. densities is permitted to the extent that the fixed or mobile service links are impaired by atmospheric conditions¹

Reason:

The current Radio Regulations for the bands 22.55 to 23.55 GHz do not protect NGSO MSS feeder links (NGSO-MSS-FL) or inter-satellite links (NGSO-MSS-ISL) from possible interference from fixed (FS) and mobile stations (MS). These links carry satellite constellation trunking traffic over digital links. The NGSO-MSS-FL and NGSO-MSS-ISL links could be disrupted by the FS or MS stations pointing above the horizon at the e.i.r.p. limit of 55 dBW without an e.i.r.p. spectral density limit.

¹This provision shall apply until such time as a recommendation on the e.i.r.p. density limit can be verified by further statistical studies on the interference relationships.

ATTACHMENT 2



NORTH ATLANTIC MILITARY COMMITTEE
COMITE MILITAIRE DE L'ATLANTIQUE NORD



NATO UNCLASSIFIED

ARFA(E)-C(94)-1982L-SPA/530/1
30 NOV 1994

TO : ARFA DISTRIBUTION LIST 5
INFO : MR. J.S. STRICK, CHAIRMAN ERC
(via ERC Secretariat)
SUBJECT : INTRODUCTION OF EMERGENCY SERVICES IN THE 380-400
MHz BAND
Reference : ARFA(S)-R(94)-0958L-SPA/154, 28 JUL 94

1. The ARFA 1994/Joint meeting requested the provision of frequencies in 380-400 MHz for the Emergency Services (ref). In addition, the ARFA Plenary was requested to propose the final position for these resources. The ARFA 1994/2nd Plenary has now agreed to accommodate the Emergency Services as follows:

- for the initial implementation, in 380-383 and 390-393 MHz,
- for the final implementation, in 380-385 and 390-395 MHz.

From 1998, the bands 380-385 and 390-395 MHz will be allotted to Tactical Radio Relay, for transfer to the Emergency Services, if and when required, based on national decisions. This proposal is based on the Emergency Services sharing with and accepting possible interference from frequency hopping systems.

2. The national ARFA representatives are requested to release a copy to their civil Administrations.
3. French translation will follow as soon as possible.

M. TANGE
Colonel, M.A.R.
Chairman ARFA

This letter consists of 1 page

C/CISRB/ERC/19821

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